

Privacy Notice

- Aon Employee Benefits –

1. Introduction

This Privacy Notice (“Notice”) explains how Aon Ireland Limited, Aon Professional Trustees and its affiliated companies and subsidiaries (“Aon”) makes use of the personal information collected about you in connection with the services. Throughout this Notice Aon may be referred to as "we", "us", "our" or “Aon”.

“**Services**” means insurance intermediary, investment, risk management, analytical, consultancy, advisory and/or other services that Aon may agree in writing to provide to you from time to time including, by way of engagement letter or statement of work;

2. Collecting Your Information

2.1 The information we collect about you may include the following:

a.	basic personal details, such as your name, address contact details, date of birth, age, gender and marital status;
b.	demographic details, such as information about your lifestyle; Personal Public Service Number; and insurance requirements, occupational details
c.	health information, such as information about your health status, medical records and medical assessment outcomes;
d.	driving history, certifications and insurance details, such as driving licence details, the period for which a licence has been held, existing and previous insurance policy details, previous accident and claims history and details of any motoring convictions;
e.	financial details, salary, savings/pension & investment holdings, income and expenditure details, bank account information and details of your credit history and bankruptcy status;
f.	claims details such as information about any claims concerning your insurance policy;
g.	Call recordings for example we may record our telephone calls for specific purposes (such as training, customer service or dispute resolution);
h.	your marketing preferences.

2.2 You are required to provide any personal information that we reasonably require to meet

our obligations in connection with the Service provided to you, including any legal and regulatory obligations. Where you refuse to provide information that we reasonably require to fulfil these obligations, we may not be able to offer the Service to you and/or we may terminate the Service provided to you with immediate effect.

- 2.3 Where you provide personal information to Aon about third party individuals (e.g. information about your spouse, civil partner, child(ren), dependants or emergency contacts), where appropriate, you should provide these individuals with a copy of this Privacy Notice beforehand or ensure they are otherwise made aware of how his/her/its information will be used by Aon.
- 2.4 In addition to collecting personal information from you directly, we may also collect personal information about you from other third parties, such as your employer, insurers, pension administrators, underwriters, reinsurers, credit reference agencies, medical professionals, government bodies, claimants, vetting and data validation agencies and other professional advisory service providers. This information may be sourced prior to and during the course of providing the Service to you.

3. Processing Your Information

We will use the information we collect about you in connection with the Service to:

- a. assess your application to receive the service;
- b. offer, administer and manage the services provided to you, including providing initial and renewal quotations and client care information;
- c. investigate and settle claims or complaints in relation to insurance policies and/or the Service provided;
- d. facilitate the prevention, detection and investigation of crime and the apprehension or prosecution of offenders;
- e. trace debtors and recover any outstanding debt in connection with the Service provided;
- f. fulfil legal and regulatory obligations and monitor compliance with the same;
- g. transfer books of business to successors of the business in the event of a sale or reorganisation;
- h. conduct market research and canvass your views about the service in order to develop and improve our products and service offerings generally;
- i. offer other products and services that may be of interest to you.

4. Legal Grounds for Processing

Aon relies on the following legal grounds to collect and use your personal information:

- a. **Performance of the service contract:** Where we offer the Service or enter into a contract with you to provide the service, we will collect and use your personal information where necessary to enable us to take steps to offer you the service,

process your acceptance of the offer and fulfil our obligations in the contract with you, especially for the processing activities set out in sections 3(a) and (b) of this Notice.

- b. **Legal and regulatory obligations:** The collection and use of some aspects of your personal information is necessary to enable us to meet our legal and regulatory obligations especially for the processing activities set out in sections 3 (f) of this Notice. For example, Aon is registered as an insurance intermediary under the European Communities (Insurance Mediation) Regulations 2005 (as amended) and is regulated by the Central Bank of Ireland (“Central Bank”). Aon’s insurance intermediary reference number with the Central Bank is C1298. Aon is subject to the Codes of business conduct including the Consumer Protection Code, the Minimum Competency Code and Fitness & Probity Standards. These codes offer protection to consumers and can be found on the Central Bank’s website www.centralbank.ie.
- c. **Legitimate interests:** The collection and use of some aspects of your personal information is necessary to enable us to pursue our legitimate commercial interests, especially for the processing activities set out in sections 3(c), (d), (e), (f), (g) (h) and (i) of this Notice, e.g. to operate our business, particularly where we offer other products and services that may be of interest to you or to conduct market research to improve our products and services generally. Where we rely on this legal basis to collect and use your personal information we shall take appropriate steps to ensure the processing does not infringe the rights and freedoms conferred to you under applicable data privacy law.
- d. **Consent:** We rely on your consent to collect and use your sensitive personal information, particularly information concerning health information where you provide this in connection with a claim against your insurance policy, especially for the processing activities set out in sections 3(c) of this Notice. We may also share this information with other insurance market participants and third parties where necessary to offer, administer and manage the services provided to you, such as insurers and insurance underwriters, reinsurers, brokers and vetting agencies.

Where we rely on your consent to collect and use your information, you are not obliged to provide your consent and you may choose to subsequently withdraw your consent at any stage once provided. However, where you refuse to provide information that we reasonably require to provide the Service to you, we may not be able to offer you the Service and/or we may terminate the Service provided with immediate effect.

Where you choose to receive the Service from us you agree to the collection and use of your sensitive personal information in the way that we describe in this section of the Privacy Notice. You should refer to the insurer’s privacy notice on their website for further information about their privacy practices.

5. Accuracy of Your Information

We rely on the availability of accurate personal information in order to provide the Service to you and operate our business. You should therefore notify us of any changes to your personal information, particularly changes concerning your contact details, bank account details, insurance policy details or any other information that may affect the proper management and administration of your insurance policy and/or the Service provided to you.

6. Recipients of Your Information

We generally share your personal information with the following categories of recipients where necessary to offer, administer and manage the services provided to you:

- a. **Within Aon:** We may share your personal information with other Aon entities, brands, divisions, and subsidiaries to serve you, including for the activities listed above.
- b. **Insurance market participants** where necessary to offer, administer and manage the services provided to you, such as insurers and insurance underwriters, reinsurers, brokers, intermediaries and loss adjusters. The insurance underwriter is the insurer that is underwriting your insurance policy and is named in your policy documentation. You should refer to the insurer's privacy notice on their website for further information about their privacy practices;
- c. **Vetting and risk management agencies**, such as credit reference, criminal record, fraud prevention, data validation and other professional advisory agencies, where necessary to prevent and detect fraud in the insurance industry and take steps to assess the risk in relation to prospective or existing insurance policies and/or the Service. For example, we may check the Claims Insurance Link to assess and/or validate your previous claims history.
- d. **Legal advisers, loss adjusters, and claims investigators**, where necessary to investigate, exercise or defend legal claims, insurance claims or other claims of a similar nature;
- e. **Medical professionals**, where you provide health information in connection with a claim against your insurance policy or your employer's insurance policy.
- f. **Law enforcement bodies**, where necessary to facilitate the prevention or detection of crime or the apprehension or prosecution of offenders.
- g. **Public authorities**, regulators and government bodies, where necessary for Aon to comply with its legal and regulatory obligations.
- h. **Third party suppliers**, where we outsource our processing operations to suppliers that process personal information on our behalf. These processing operations shall remain under our control and will be carried out in accordance with our security standards and strict instructions.
- i. **Successors of the business**, where Aon or the Service is sold to, acquired by or merged with another organisation, in whole or in part. Where personal information is shared in these circumstances it will continue to be used in accordance with this Notice.

7. Overseas Transfers of Your Information

- 7.1 We operate on a global and worldwide basis and we therefore reserve the right to transfer personal information about you to other countries including without limitation USA and India to be processed for the purposes outlined in the Privacy Notice. In particular, we may make such transfers to offer, administer and manage the Service provided to you and improve the efficiency of our business operations. We shall endeavour to ensure that such transfers comply with all applicable data privacy laws, regulations and provide appropriate protection for the rights and freedoms conferred to individuals under such laws.
- 7.2 Where we collect personal information about you in the European Economic Area (the “EEA”) or the UK we may transfer the information to countries outside the EEA or UK for the processing purposes outlined in this Privacy Notice. This may include transfers to countries that the European Commission (the “EC”) and the UK data protection regulator consider to provide adequate data privacy safeguards and to some countries that are not subject to an adequacy decision. Aon has an intra-group data transfer agreement in place which regulates cross-border transfers of your personal information within the Aon Group and which incorporates the EU and UK standard contractual clauses approved by the EC and UK data protection regulator. Where we transfer personal information to third parties located in countries that are not subject to an adequacy decision we shall put in place appropriate safeguards, such as the aforementioned data transfer agreements approved by the EC or UK data protection regulator, as appropriate. Where necessary, we may implement additional technical, organisational or contractual measures to ensure an adequate level of protection for your personal information. Where required, further information concerning these safeguards can be obtained by contacting us.

8. Retention of Your Information

We retain appropriate records of your personal information to operate our business and comply with our legal and regulatory obligations. These records are retained for predefined retention periods that may extend beyond the period for which we provide the services to you. In most cases we shall retain your personal information for no longer than is required under the applicable laws. We have implemented appropriate measures to ensure your personal information is securely destroyed in a timely and consistent manner when no longer required.

9. Information Security

The security of your personal information is important to us and we have implemented appropriate security measures to protect the confidentiality, integrity and availability of the personal information we collect about you and ensure that such information is processed in accordance with applicable data privacy laws.

10. Your Information Rights

10.1 You have the following rights under applicable data privacy law in respect of any personal information we collect and use about you:

- a. The right to access and inspect your personal information or be provided with a permanent copy of the information being held about you.
- b. The right to request the correction of your personal information or in cases where the accuracy of information is disputed, to supplement the information to give notice that you dispute its accuracy.
- c. The right to request the erasure of your personal information, particularly where the continued use of the information is no longer necessary.
- d. The right to object to the use of your personal information, particularly where you feel there are no longer sufficient legitimate grounds for us to continue processing the information.
- e. The right to object to the use of your personal information for direct marketing purposes. See section 11 below for further information.
- f. The right to request the restriction of your personal information from further use, e.g. where the accuracy of the information is disputed and you request that the information not be used until its accuracy is confirmed.
- g. The right to request that some aspects of your personal information be provided to you or a third party of your choice in electronic form to enable its reuse.
- h. The right to object to decisions involving the use of your personal information, which have been taken solely by automated means. See section twelve (12) below for further information.
- i. The right to withdraw consent at any time, whenever we have asked for your consent for processing your personal information without affecting the lawfulness of processing based on consent before its withdrawal.
- j. The right to complain to the relevant the Data Protection Commissioner concerning our processing of your personal information.

10.2 It is important to note, however, that some of the rights described above in section 10.1 can only be exercised in certain circumstances. If we are unable to fulfil a request from you to exercise one of your rights under applicable data privacy law we will write to you to explain the reason for refusal (e.g., for compliance with a legal obligation, for the establishment, exercise or defence of legal claims or legal exemptions). Where required, further information concerning these rights and their application can be obtained by contacting the by contacting us.

11. Direct Marketing

We will use your personal information to send you direct marketing about other products and

services that we feel may be of interest to you. Your personal information will only be used for direct marketing in accordance with applicable laws and regulations. We will always give you the opportunity to refuse direct marketing when you receive direct marketing communications from us (usually in the form of an “unsubscribe link”). You can also change your marketing preferences at any stage by contacting us via Aon Global Preference Center. Please note that, even if you opt out of receiving direct marketing communications, we may still send you service-related communications where necessary.

12. Automated Decisions

Where you apply or register to receive the Service we may carry out a real-time automated assessment to determine whether you are eligible to receive the Service. An automated assessment is an assessment carried out automatically using technological means (e.g. computer systems) without human involvement. This assessment will analyse your personal information and comprise a number of checks, such as credit history and bankruptcy check, health check, validation of your previous claims history and other fraud prevention checks. Where your application to receive the Service does not appear to meet the eligible criteria, it may be automatically refused and you will receive notification of this during the application process. However, where a decision is taken solely by automated means involving the use of your personal information, you have the right to challenge the decision and ask us to reconsider the matter, with human intervention. If you wish to exercise this right you should contact your account handler or broker.

13. Complaints

If you wish to make a complaint about the way we use your personal information you should raise this with us by contacting us in the first instance:

Data Protection Office, 15 George’s Quay, Dublin 2, D02 VR98
or email privacy@aon.ie

However, if you are not satisfied with the way we have handled your complaint you have the right to raise the matter with the relevant data protection regulator.

Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland
or online at <https://www.dataprotection.ie/en/contact/how-contact-us>.

14. Changes to this Notice

This Notice is not contractual, and Aon reserves the right to reasonably amend it from time to time to ensure it continues to accurately reflect the way that we collect and use personal

information about you. Any updates or changes to this Notice will be made available to you. You should periodically review this Notice to ensure you understand how we collect and use your personal information.

This privacy notice was last updated: **October 2023**

15. Contact Information

If you have any questions about the content of this Notice or the rights conferred to you under applicable dataprivacy law you should contact the Global Data Privacy Office at the following address:

Data Protection Office
15 George's Quay,
Dublin 2, D02 VR98
Email: privacy@aon.ie